

## REMARKS/ARGUMENTS

The Office action dated 12/28/2010 has been received and carefully considered. By this amendment, Claims >>> are amended. After entry of this Amendment, Claims 1-14 are pending and claims 15-20 are withdrawn. In view of these amendments and the following remarks, Applicants respectfully request reconsideration.

### **Drawing Objection**

The drawing was objected to for various reasons. A replacement drawing is submitted herewith, which should overcome the examiner's concerns.

With respect to the examiner's concern regarding inner and outer portions being coupled together, applicant points to Figures 1A and especially 1B, where such coupling is depicted. Similarly, sleeve 126B is depicted in Figure 1B. Regarding reference character "120A" in Figure 1A, applicant has amended Figure 1A to refer to outer pipe section 120A as 120A", and the specification was amended accordingly. Reference numeral 130C was canceled from Figure 1C.

### **Specification Objection**

The specification was objected to for various reasons. With respect to the abstract, a replacement abstract is submitted herewith. With respect to the formatting, it is not clear to the applicant where the rules require non-formatted text. Clarification is respectfully requested. Regarding drawing element 130 in Figure 1C, the element has been deleted and the objection is therefore moot. Reference character 120A is corrected to read 120A". The phrase "an outer portion" has been replaced with --outer portions--.

### **Claim Objection**

The claims were objected to for various reasons. Applicant amended the claims according to the examiner's suggestions.

### **35 USC § 112(2<sup>nd</sup> paragraph)**

**Claim 1** was rejected under 35 USC § 112(2<sup>nd</sup>) as being indefinite for use of the phrase "... wherein the inner transition element forms a conduit that transfers cryogenic product from a

first cryogenic pipeline to a second cryogenic pipeline..." Applicant amended claim 1 to even more clearly point out the claimable subject matter.

**Claim 7** was rejected under 35 USC § 112(2<sup>nd</sup>) for lack of antecedent basis for the term "the inner transition elements". Applicant amended claim 7 accordingly.

**Claim 9** was rejected under 35 USC § 112(2<sup>nd</sup>) for lack of clarity. Applicant amended claim 9 to even more clearly point out the claimable subject matter.

**Claim 14** was rejected under 35 USC § 112(2<sup>nd</sup>) for lack of clarity. Applicant amended claim 14 to even more clearly point out the claimable subject matter.

### **35 USC § 102(b)**

**Claims 1-7 and 9-14** were rejected under 35 USC § 102(b) as being anticipated by McKay et al. (U.S. Pat. No. 3,865,145). The Applicant respectfully disagrees.

Most significantly, it is pointed out that McKay's device is a stress cone that is *externally applied to pipeline sections*, where the stress cone serves as an anchor point to allow application of compressive forces onto the pipeline section, which are relieved upon thermal contraction of the pipeline. Consequently, *there is no thermal stress load which can be transferred from the pipeline to the jacket pipeline*.

Additionally, it is entirely *unclear where McKay teaches an inner transition element that forms a conduit that is configured to allow transfer of a cryogenic product from a first cryogenic pipeline to a second cryogenic pipeline*. Once more, McKay uses an externally applied stress cone, which is entirely inconsistent with the above element of claim 1.

Similarly, claim 9 requires an inner portion of the field joint to be configured to allow fluidly coupling of a first and a second section of a product conduit of the pipeline. Once more, such is clearly not the case in McKay.

With respect to the examiner's analysis of the dependent claims, the same defects apply and are not reiterated here. For at least these reasons, the rejections should be withdrawn.

**35 USC § 103(a)**

**Claim 8** was rejected under 35 USC § 103(b) as being obvious over McKay et al. (U.S. Pat. No. 3,865,145). The Applicant once more respectfully disagrees.

Since McKay fails to teach each and every element as pointed out above, combination of McKay with the knowledge of the PHOSITA fails to properly render claim 8 obvious over McKay. For at least these reasons, the rejections should be withdrawn.

**Request For Allowance**

Claims 1-20 are pending in this application, with claims 15-20 being withdrawn. The applicant requests allowance of all pending claims.

Respectfully submitted,  
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